



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



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Lower Darby Creek Area Superfund Site Interview Summary Confidential Source #15



(b) (6)

INTERVIEW SUMMARY
Work Assignment ES002
Lower Darby Creek Area Site

(b) (6)

Prepared for:

U.S. Environmental Protection Agency
Region III
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

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Work Assignment Number:	ES002
Date Submitted:	February 28, 2002
Contract Number:	68-S3-01-01
EPA Work Assignment Manager:	Carlyn Prisk
Telephone Number:	(215) 814-2625
DASTON Work Assignment Manager:	(b) (4)
Telephone Number:	
Interviewer:	Tri-State Enterprise

(b) (6)

Name: (b) (6) (WITNESS)
C/O Joseph F. O'Dea, Jr., Saul Ewing, LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102

Affiliation: Former Employee/Tri-County Hauling and Eastern Industrial

Telephone: (215) 927-7109

Type of Interview: In-Person

Date of Interview: February 21, 2002

On February 21, 2002, the WITNESS was interviewed at the residence of (b) (6) by Michael McCloskey of Tri-State Enterprise. The WITNESS was interviewed as part of the potentially responsible party search currently being conducted under Work Assignment NO. ES-002 involving the Lower Darby Creek Area, Delaware County, PA (the "Site"). This interview focused on the Folcroft Landfill (Folcroft). The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked and advised that the interview was voluntary. This interview was not tape-recorded. The WITNESS advised that he is represented by an attorney, Joseph O'Dea, Jr. The following individuals were present during this interview:

- Joseph F. O'Dea, Jr.: Attorney representing Waste Management Corporation and (b) (6)
- Brian Nishitani: Attorney for the United States Environmental Protection Agency, Region III (USEPA).
- Carlyn Prisk: Civil Investigator for the USEPA, Region III.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was shown a map of the Site and a sketch of the Site. This map and sketch were used throughout the interview. The WITNESS was unable to see the details in the map. Therefore, the map was not used to identify any locations described by the WITNESS.

The WITNESS was asked to explain his association with the Site.

The WITNESS stated that he worked for Delaware County, PA for (b) (6) years and retired on (b) (6). He indicated that during the time he worked for Delaware County he also worked for both Eastern Industrial and Tri-County Hauling as a trash truck driver.

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When asked to describe his duties with Delaware County, the WITNESS stated that he worked at the three (3) Delaware County incinerators.

When asked if he had ever worked at the incinerator located on the access road leading to the Folcroft Landfill, the WITNESS stated yes. The WITNESS stated that he worked at this incinerator as a Delaware County employee, although he could not recall the specific years that he worked there. He indicated that the incinerator was used to dispose of residential waste from local communities. He indicated that most of the local communities operated their own trash trucks and disposed of the waste at the incinerator.

When asked the names of these local communities that disposed of waste at this incinerator, the WITNESS provided the following:

- Ridley
- Upper Darby
- Havertown
- Collingdale
- Darby

The WITNESS stated that prior to the opening of Folcroft, Delaware County operated a landfill located next to the incinerator. The WITNESS was unable to provide any specific information about how this landfill was used.

The WITNESS stated that he worked for Tri-County Hauling for approximately 12 years during the time period he worked for Delaware County. He indicated that he also worked for Eastern Industrial for a shorter period of time during the years he was employed by Delaware County.

The WITNESS was asked in several ways to try to identify the specific years he worked for Tri-County Hauling and Eastern Industrial. The WITNESS indicated that he was very bad at remembering dates and could not be specific as to the time period he worked for either company.

The WITNESS stated that he recalls working for Tri-County for approximately 12 years and Eastern Industrial for a much shorter period of time. He indicated that he might have worked for Eastern Industrial for about 6-months. He indicated that he worked for both Tri-County Hauling and Eastern Industrial during the time period Folcroft was in use and transported all of the waste he picked up while working for Tri-County Hauling and Eastern Industrial to Folcroft.

The WITNESS stated that when he worked for Eastern Industrial he would pick up a roll-off truck at night that was parked on the street in front of the Robinson Ford car dealership in Glenolden, PA. He indicated that the keys to the truck were left under the driver's seat. He indicated that he would return the truck in the early morning hours to the same location and leave the keys under the seat.

The WITNESS stated that he worked at the Tri-County Hauling transfer station located behind the 7-UP Plant in Conshohocken, PA for about nine (9) of the twelve (12) years he worked for Tri-County Hauling. The WITNESS explained that Tri-County Hauling maintained four (4) trailers at that location that were used as dumpsters for trash brought in by trash trucks from local communities. The WITNESS stated that the following communities disposed of waste at this transfer station:

- Conshohocken
- Plymouth Meeting
- Norristown: The WITNESS stated that the City of Norristown operated about four (4) trash trucks.

The WITNESS stated that all of the waste collected at this transfer station was transported to Folcroft during the time the landfill was in operation.

When asked to describe the types of waste that was collected at the transfer station the WITNESS stated that it was all household waste. He was unable to provide a further description.

When asked to identify the locations that he picked up waste from and disposed of at Folcroft when he drove a trash truck for Tri-County Hauling and to describe the waste from each location. The WITNESS stated that he did not know what the waste was at any location. He indicated that he never bothered to look. The WITNESS provided the names of the following locations that he picked up waste from:

- Merck Sharp & Dohme (Merck): The WITNESS stated that Merck is located off of Route 411 outside of Norristown, PA. The WITNESS stated that he picked up a 20-yard compactor container at this location about one time each month. He indicated that other Tri-County drivers also picked up containers from this location indicating that a pick up from this location was more frequent than once a month. The WITNESS stated that he would be directed to a bay area by the front guardhouse. He indicated that he would back up into the bay and the container would be loaded. The WITNESS stated that a supervisor from Merck would follow him to Folcroft and observe while the waste was dumped at the landfill. When asked the name of this supervisor, the WITNESS stated that he did not know. He was unable to describe the waste.
- Philly Gear: The WITNESS stated that Philly Gear is located on the expressway just before the Pennsylvania Turnpike. The WITNESS stated that this company operated 24-hours-a-day and that he picked up a compactor container about one time each week. He was unable to describe the waste.
- US Post Office, 30th Street Station, Philadelphia, PA: The WITNESS stated that he picked up a roll-off container about one time each day. He described the waste as paper.

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- Havertown Sewage Plant: The WITNESS stated that he picked up a 20-cubic yard roll-off container form this location two times in the morning, two times at lunch and two times in the evening.
- McCloskey Construction: The WITNESS stated that he picked up roll-off containers from construction sites for McCloskey Construction. He indicated that these construction sites were located at numerous different locations and he could not be specific other than The Spectrum in Philadelphia, PA.

When asked the names of other drivers for Tri-County Hauling, the WITNESS provided the following:

- Mike Esher
- Freddie (Unknown last name)
- Bobby Williams: Worked at Folcroft
- Henry (Unknown last name): Operated the crane at Folcroft

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____ Signed _____
(Date) (Name)